

EXHIBIT A

From: [Sean Pinner](#)
To: [Siegmund, Heidi E.](#)
Subject: Re: Apple Response; Case Number: 6:21-cv-00055; (202200062908)
Date: Tuesday, January 10, 2023 10:09:30 AM

****EXTERNAL EMAIL; use caution with links and attachments****

Hi Heidi,

Happy to discuss this further but the items requested in the subpoena are either not available from Apple, are already available from the account holder or contain contents of communications which federal law prevents Apple from providing. Have you subpoenaed any of this information from the account holders?

Thanks,
Sean

Begin forwarded message:

From: "Siegmund, Heidi E." <HSiegmund@mcguirewoods.com>
Subject: RE: Apple Response; Case Number: 6:21-cv-00055; (202200062908)
Date: January 8, 2023 at 8:17:20 PM PST
To: Subpoenas <Subpoenas@apple.com>
Cc: "Betts, E. Windsor" <EBetts@mcguirewoods.com>

Thank you Sean. To confirm, is it Apple's position that Apple will not be producing any of the documents or data requested?

Heidi

Heidi E. Siegmund

Associate
McGuireWoods LLP
T: +1 804 775 1049 | M: +1 540 847 9531
hsiegmund@mcguirewoods.com

From: Subpoenas <Subpoenas@apple.com>
Sent: Sunday, January 8, 2023 11:15 PM
To: Siegmund, Heidi E. <HSiegmund@mcguirewoods.com>
Subject: Re: Apple Response; Case Number: 6:21-cv-00055; (202200062908)
Importance: High

****EXTERNAL EMAIL; use caution with links and attachments****

Dear Ms. Siegmund,

As previously mentioned, account holders may sign into the portal at privacy.apple.com to obtain a copy of any data available from Apple. Additional data may also be available to account holders through on their Apple devices.

Sincerely,

Sean Pinner
Apple Privacy & Law Enforcement Compliance
Apple Inc.
subpoenas@apple.com
<http://www.apple.com/privacy/>

From: "Siegmond, Heidi E." <HSiegmond@mcguirewoods.com>
Subject: FW: Apple Response; Case Number: 6:21-cv-00055; (202200062908)
Date: January 3, 2023 at 12:00:08 PM PST
To: Subpoenas <Subpoenas@apple.com>
Cc: "Betts, E. Windsor" <EBetts@mcguirewoods.com>

Good afternoon, please advise on the status of the below.

Thank you,
Heidi

Heidi E. Siegmond
Associate
McGuireWoods LLP
T: +1 804 775 1049 | M: +1 540 847 9531
hsiegmond@mcguirewoods.com

From: Siegmond, Heidi E.
Sent: Tuesday, December 6, 2022 9:50 PM
To: 'Subpoenas' <Subpoenas@apple.com>
Cc: Betts, E. Windsor <EBetts@mcguirewoods.com>
Subject: RE: Apple Response; Case Number: 6:21-cv-00055; (202200062908)

Good evening,

In accordance with the request in the letter that accompanied the email below, please see attached a signed consent form from Mr. Lamb authorizing Apple's compliance with our subpoena, which is also attached to the consent form for ease of reference. Please confirm receipt and please let me know if Apple requires any further information to provide a complete response to our subpoena.

Kind regards,
Heidi

Heidi E. Siegmond
Associate
McGuireWoods LLP
T: +1 804 775 1049 | M: +1 540 847 9531
hsiegmond@mcguirewoods.com

From: Subpoenas <Subpoenas@apple.com>
Sent: Monday, October 10, 2022 12:08 PM
To: Siegmond, Heidi E. <HSiegmond@mcguirewoods.com>
Subject: Apple Response; Case Number: 6:21-cv-00055; (202200062908)

EXTERNAL EMAIL; use caution with links and attachments

Via Email Delivery

Heidi Siegmond

McGuire Woods LLP
800 East Canal Street
Richmond, VA 23219

Re: Walter Scott Lamb v. Liberty University, Inc.

Hello,

Please see the attached letter for Apple Inc.'s response to the request received in the above matter.

Sincerely,

Apple Privacy & Law Enforcement Compliance
Apple Inc.
subpoenas@apple.com
<http://www.apple.com/privacy/>

Enclosure

This transmission may contain confidential information intended only for the person(s) named above. Any other distribution, re-transmission, copying or disclosure is strictly prohibited. If you have received this transmission in error, please notify subpoenas@apple.com immediately and delete this file/message from your system.

This e-mail from McGuireWoods may contain confidential or privileged information. If you are not the intended recipient, please advise by return e-mail and delete immediately without reading or forwarding to others.

<Scott Lamb -- Apple Signed Consent.pdf>